



RECEIVED
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COMMISSION MAIL ROOM

1999 DEC 20 A 8:28

December 16, 1999

Attn: Angel L. Williamson, Reports Analyst
Reports Analysis Division
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Identification Number: C00300921

Reference: Mid-Year Report (1/1/99-6/30/99)

This memorandum is in response to your letter dated December 1, 1999 that was submitted due to concerns prompted by your review of the Mid-Year Report (1/1/99-6/30/99):

Corporate Contribution

It was brought to our attention that we reported a corporate contribution from Calver Corporation for the amount of \$5,000 on 4/7/99. Based on this concern, we reviewed our financial records noting that it appears that this contribution was mistakenly deposited into our federal account. As a result, we have transferred this amount to our non-federal account which is not used to influence federal elections. In addition, we will notify Calver Corporation of this action. We will work diligently to ensure this incident does occur in the future. See attached copy of check representing transfer to our non-federal account. See attachment 1.

Corporate Transfer-Out

This represents the transfer-out of a corporate contribution that was received on 10/28/98 and included on Line 11(a) of the 30-Day Post-General Report (10/1/98-11/23/98). An amendment was submitted to your agency documenting the corrective action taken for this receipt dated 3/26/99. This corrective action was based on an inquiry that we received from your agency dated 3/11/99. The transfer-out is dated as 3/25/99 on the Mid-Year Report (1/1/99-6/30/99) and the check for this transfer-out is dated as 3/18/99.

"Best Efforts"

In response to your concerns regarding our "best efforts" to obtain the full name, mailing address, occupation and name of employer for contributors who exceed the \$200 threshold, the following procedures are performed:

• **Clear and Conspicuous Request**

All solicitations include an accurate and clear statement of the law's requirements for the collection and reporting of the above contributor information.

• **Follow-Up Requests Within 30 Days**

On a monthly basis, a report is generated that list all contributors who have contributed over \$200 at the completion of the month. This report is then reviewed and any contributors identified who did not provide the FEC required information are identified. A written follow-up request is then sent to the contributors who provided the incomplete information. Due to the recent increase in the number of contributors who cause this situation, we are currently exploring options to automate this process because the current process is quite manual. All follow-up requests to contributors of more than \$200 include the following wording:



"To comply with Federal law, we must use best efforts to obtain, maintain, and submit the name, mailing address, occupation, name of employer of individuals whose contributions exceed \$200 per calendar year."

- Pre-Addressed Envelope

A pre-addressed envelope is provided along with all follow-up requests for information. Please see the pre-addressed envelope included with this respond. In cases where postcards are sent for follow-up requests, the postcards are pre-addressed. See attachment 5.

- File Amendments

As we file on a quarterly basis (bi-annually in nonelection years), most of the information obtained from our follow-up requests is reported during the regularly scheduled report as oppose to requiring an alternate reporting mechanism. For information obtained from follow-up requests that are received subsequent to the related reporting date, our procedures are established to report this information in a memo schedule A with the next regularly scheduled report. To ensure compliance, we are currently refining our procedures to ensure we are effectively and efficiently filing memo schedule A to report this data.

We believe these procedures are in compliance with the "best efforts" standard, however, please review and determine if this is the case. See attachment 2.

Credit Card Payments

See the attached schedule that itemizes the original vendors that exceeded the \$200 threshold as of the mid-year reporting cycle. See attachment 3.

Signature Authorization

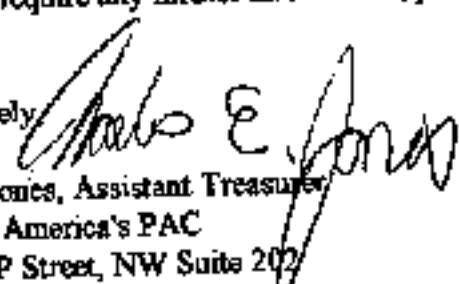
The assistant treasurer-Charles E. Jones has been authorized as a designated agent to sign reports submitted to your agency. A letter was sent to your agency as notification that Charles E. Jones was appointed assistant treasurer in April 1996. This notification is located on your on-line archives as display image (9603D450346). A copy of the letter concerning this matter is attached. See attachment 4.

Contribution Categorization

We will report contributions to other PACs on Line 23 and for non-federal candidates on Line 29 in future reports as stipulated in Form 3X instructions.

If you require any further information, please contact me at (202) 785-9619 or write me at the address shown below.

Sincerely,


C.E. Jones, Assistant Treasurer
Black America's PAC
2029 P Street, NW Suite 202
Washington, DC 20036

Attachment 1

BLACK AMERICA'S PAC
SUITE 202, 2029 P STREET N.W.
WASHINGTON, DC 20036

PAY
TO THE
ORDER OF

BAMPAC NON-FEDERAL Account

FIVE THOUSAND DOLLARS EXACTLY

First Union

First Union National Bank
KIT 054001220

FOR Corporate Contribution Transfer

Adrian

⑈003286⑈ ⑈054001220⑈ 206670167716⑈

3286

15-122/540
BRANCH 00400

DATE 12.15.99

\$15,000.00

DOLLARS

Attachment 2

XXNAME's 1999 Renewal Reply

XXNAME
 XXADDRESS
 XXADDRESS
 XXCITY, STATE, ZIP

XXCODE
 XXID#

I. Alan, I want to build on our success offering black voters a conservative alternative to the racially-divisive politics of the black radicals. I'm using my PRIORITY MAIL BOX to return this reply with my check made out to "Black America's PAC" in the amount of:

☐ 1.5 HPD (XXNAME, I hope you can send this much!)

☐ HPD (I'm counting on you for at least this much.)

☐ Other: \$ _____

(XXNAME, please enclose your check payable to "Black America's PAC" with this reply in your PRIORITY MAIL BOX. Peel off the strip on the flap of the box to expose the sticky glue that holds the flap closed. The postage for the box is already taken care of for you. Thank you for renewing your support. Your advice below is appreciated but not required to renew your support.)

II. Your advice for 1999 (optional): _____

Paid for by Black America's Political Action Committee (BAMPAC). Alan L. Keyes, Chairman. Not authorized by any candidate or candidates committee. Not printed or mailed at government expense. Maximum contribution allowed by federal law is \$5,000. Corporate contributions cannot be accepted. Contribution to Black America's PAC are not tax deductible. Federal law requires political committees to report the name, mailing address, occupation and name of employer for each individual whose contributions aggregate in excess of \$200 in a calendar year. Federal law requires us to ask you:

Occupation: _____

Place of Business: _____

City and State Where Employed: _____

1710 Underpass Way, Hagerstown, MD 21740-6924

Black America's Political Action Committee

Attachment 3

Identification Number: C00300921

Reference: Mid-Year Report (1/1/99-6/30/99)

Vendors which exceed \$200 for year (1/1/99-6/30/99):

Vendor Name	Amount	Date	Purpose	Mailing Address
Adam's Mark Hotel	\$ 1,252.57	4/27/99	Lodging	Denver, CO
Adam's Mark Hotel Total	\$ 1,252.57			
American Airlines	\$ 2,808.00	6/4/99	Travel	Washington, DC
American Airlines Total	\$ 2,808.00			
Continental Airlines	\$ 660.00	5/7/99	Travel	Washington, DC
Continental Airlines	\$ 1,395.00	6/25/99	Travel	Washington, DC
Continental Airlines Total	\$ 2,055.00			
Doubletree Hotel	\$ 541.00	2/10/99	Lodging	Sacramento, CA
Doubletree Hotel Total	\$ 541.00			
Gateway	\$ 5,990.74	5/13/99	Office Equipment	N. Sioux City, SD
Gateway Total	\$ 5,990.74			
Hertz Rental	\$ 304.59	2/23/99	Car Rental	Denver, CO
Hertz Rental	\$ 144.57	6/7/99	Car Rental	San Francisco, CA
Hertz Rental	\$ 194.50	5/31/99	Car Rental	Houston, Texas
Hertz Rental	\$ 125.43	1/25/99	Car Rental	Ft Myers, FL
Hertz Rental Total	\$ 769.09			
Hilton Hotels	\$ 889.62	5/17/99	Lodging	San Francisco, CA
Hilton Hotels Total	\$ 889.62			
Hyatt Regency-Houston	\$ 699.01	6/1/99	Lodging	Houston, TX
Hyatt Regency-Houston Total	\$ 699.01			
Marriot City Center	\$ 575.52	2/24/99	Lodging	Denver, CO
Marriot City Center Total	\$ 575.52			
Marriot Hotels-Atlanta	\$ 450.17	5/23/99	Lodging	Atlanta, GA
Marriot Hotels-Atlanta Total	\$ 450.17			
Marriot Hotels-Los Angeles	\$ 361.34	6/8/99	Lodging	Washington, DC
Marriot Hotels-Los Angeles Total	\$ 361.34			
St Regis Hotel	\$ 629.50	7/9/99	Lodging	Philadelphia, PA
St Regis Hotel Total	\$ 629.50			
The Berkeley Hotel	\$ 430.78	4/7/99	Lodging	Richmond, VA
The Berkeley Hotel Total	\$ 430.78			
United Airlines	\$ 344.00	1/28/99	Travel	Washington, DC
United Airlines	\$ 344.00	1/30/99	Travel	Washington, DC
United Airlines	\$ 430.00	3/20/99	Travel	Washington, DC
United Airlines	\$ 430.00	3/20/99	Travel	Washington, DC
United Airlines	\$ 847.50	3/20/99	Travel	Washington, DC
United Airlines	\$ 1,776.00	6/15/99	Travel	Washington, DC
United Airlines	\$ 2,498.00	6/30/99	Travel	Washington, DC
United Airlines Total	\$ 6,669.50			
US Air	\$ 616.00	4/1/99	Travel	Washington, DC
US Air	\$ 1,273.50	6/17/99	Travel	Washington, DC
US Air Total	\$ 1,889.50			
Grand Total	\$ 26,011.34			

Attachment 4



April 18, 1996

The Federal Election Commission
999 E Street, NW
Washington, DC 20461

Dear FEC:

Effective April 20, 1996, Black America's Political Action Committee will file reports quarterly. Additionally, Charles E. Jones, CPA will serve in the Assistant Treasurer position.

Sincerely,

Alvin Williams
Executive Director

HOW TO USE:



1. COMPLETE ADDRESS LABEL AREA
Type or print required return address and addressee information in customer block (white area) or on label (if provided).



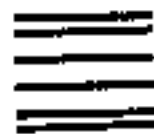
2. PAYMENT METHOD
After postage or meter stamp to area indicated in upper right hand corner.



3. ATTACH LABEL (if provided)
Remove label backing and adhere over customer address block area (white area).

**FOR PICKUP CALL
1-800-222-1811**

PSN 100 100



NO POSTAGE
NECESSARY
IF MAILED
IN THE
UNITED STATES



BUSINESS REPLY LABEL

FIRST CLASS MAIL PERMIT NO. 857 HAGERSTOWN, MD

POSTAGE WILL BE PAID BY ADDRESSEE

Black America's PAC

1710 Underpass Way
Hagerstown, MD 21740-9907



Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

☒ Hand Delivered Date of Receipt

12-20-98

☐ First Class Mail POSTMARKED

☐ Registered/Certified Mail POSTMARKED

☐ No Postmark

☐ Postmark Illegible

☐ Received from the House office of Records
and Registration Date of Receipt

☐ Received from the Senate Office of Public
Records Date of Receipt

☐ Other (Specify): Postmarked
and/or Date of Receipt

☐ Electronic Filing

Jm13
PREPARER

12-20-98
DATE PREPARED